

Crystal L. Cox  
Investigative Blogger  
Pro Se Defendant  
**Oregon Civil No. CV 11-0057 HZ**

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
Portland Division

OBSIDIAN FINANCE GROUP, LLC and  
KEVIN D. PADRICK, Plaintiffs

**Civil No. CV 11-0057 HZ**

**Proposed Verdict Form**

**Questions.**

1. Did the Plaintiff (Public Figure) prove that this particular post, of material fact in this case influenced the Bank VP, as in David Brown's Declaration to decline giving Obsidian Finance Group a \$10 Million dollar loan?
2. Did Plaintiff (Public Figure) prove, with convincing clarity, that they lost any revenues between the date of the post, 12/25/10, and the date of the filing of Plaintiff's defamation suit, 01/14/11 (20 days)?
3. Was the Defendant given the opportunity to remedy the situation, as required in Oregon Retraction Statutes ?
4. Did Plaintiff prove with convincing clarity that there was actual malice in this case and that the Defendant Knowingly, Falsely posted subject post?
5. Did Plaintiff prove this particular post caused defamation to Plaintiff ?
6. Did Plaintiff prove reason for this post not being a definitive statement submitted in the original complaint? And did Plaintiff prove why was this subject post was not a material fact of this case until 07/22/11?
7. Did Plaintiff prove reasons for not giving all discovery, interrogatory requests to Defendant while the Defendant was ordered by the Judge to turnover everything requested by the Plaintiff?

8. Did Plaintiff Prove that Defendant had no right to apply Oregon Anti-Slapp Statute to this Case?
9. Did Plaintiff Prove that Oregon Shield Laws do not apply to Defendant?
10. Did Plaintiff prove that Defendant is not Protected under the First and Fourteenth Amendment in the publishing of this blog post.
11. Did Plaintiff prove with convincing clarity that the subject blog post is not factual, and is defamatory in nature ?
12. Was the Defendant denied due process by the Courts or the Plaintiff?